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1 them -- whatever. They either retired or
2 something.
3 Q. But what hospital did they go to, do you
4 remember?
5 A. I believe it was the one in Waltham on -- I
6 think it's on Main Street. I'm not sure. I
7 don't know the name.
8 MR. AHERN: Okay. Just one second.
9 That's all I have. Thank you, Mr. Broadbent.
10 FURTHER EXAMINATION
11 BY MS. LINDEMANN:
12 Q. Hi, Mr. Broadbent. I'm Frances Lindemann and I
13 represent Hardric Laboratories and I hopefully
14 don't have too many questions.
15 I'm going to be focusing on the
16 period of time between 1983 and 1986, so sort of
17 the mid '80's.
18 A. '93 --
19 Q. '83 to '86, that time period roughly, so mid
20 '80's.
21 A. I don't believe Suzanne was there in '86, was
22 she?
23 Q. Well, I think you had testified that you thought

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1 she moved to --
2 A. Not '83. Well, wait a minute. '83 to --
3 Q. I'm not talking '90's. I'm talking '80's. So
4 she was there -- you said you thought she moved
5 to quality control in '87.
6 A. That's correct.
7 Q. So the years right before that.
8 A. I'm going to say that she was probably there
9 from '83 --
10 Q. She might have been there earlier.
11 A. Yeah; yeah. She'd be there then, yeah.
12 MR. HONIK: Mr. Broadbent, may I
13 remind you the rule that Mr. Ubersax asked you
14 to follow which is to allow one person to speak
15 at a time so all this can get recorded in the
16 right way.
17 THE WITNESS: Okay.
18 Q. You know, for my own purposes, I'm just focusing
19 on that brief period of time, 1983 to 1986, that
20 period of time.
21 A. Yeah, that would be fine.
22 Q. And were you her supervisor during that period
23 of time roughly?

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1 A. I believe I was.
2 Q. Did she work on any other projects during that
3 time period than the ARCO project?
4 A. I knew she worked extensively on ARCO. It was
5 number one. And I believe she did like fill-in
6 jobs or -- I can't remember the exact things
7 that she did, but small fill-in jobs. It took
8 very little training, you know, that you could
9 sit down with the girl and say, "hey, take this
10 and stick it there and weld it there" or
11 something like that, but nothing -- not a
12 specific tube type, I'll put it that way.
13 Q. Again, you testified earlier that 90 percent of
14 her time you thought was spent on the ARCO
15 project?
16 A. Yeah. That was kind of her pet thing.
17 Q. So the other ten percent was on minor -- it
18 wasn't working on a particular project long-term
19 but on little jobs?
20 A. That's correct.
21 Q. Okay. Did she work with any other beryllium
22 containing materials other than beryllium oxide
23 windows?

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1 A. Not to my knowledge.
2 Q. Where was this Spencer Laboratories located?
3 A. Spencer's in Burlington.
4 Q. Roughly what time period were the buildings
5 renovated?
6 A. Oh, boy. Gee, I'm terrible on time. Gee, I
7 can't come up with a --
8 Q. I don't want you to guess. You can just say, I
9 don't know, I don't remember.
10 A. I don't really know the exact time.
11 Q. You -- at some point during your deposition,
12 you've used the terms beryllium and beryllium
13 oxide interchangeably and beryllia. Are you
14 familiar with the difference between solid
15 beryllium metal and beryllium oxide?
16 A. Yes, I am.
17 Q. Okay. So when you said beryllium --
18 Beryllium, in this particular deposition, I'm
19 talking windows.
20 Q. So which would be beryllium oxide?
21 A. Yes.
22 Q. Okay. Were you familiar with any Raytheon
23 Waltham facilities for working with beryllium

29 (Pages 110 to 113)